

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WISCONSIN**

Jill Swenson, Melody McCurtis, Maria
Nelson, Black Leaders Organizing for
Communities, Disability Rights
Wisconsin,

Plaintiffs,

v.

Marge Bostelmann, Julie M. Glancey,
Ann S. Jacobs, Dean Knudson, Robert F.
Spindell, Jr., and Mark L. Thomsen,
*Commissioners of the Wisconsin
Elections Commission*; Meagan Wolfe,
*Administrator of the Wisconsin
Elections Commission*,

Defendants.

Case No. 3:20-cv-459-wmc

**THE WISCONSIN LEGISLATURE'S PROPOSED
MOTION TO DISMISS THE COMPLAINT**

Under Rules 12(b)(1) and 12(b)(6) of the Federal Rules of Civil Procedure and this Court's inherent authority to stay a case, Proposed-Intervenor Defendant the Wisconsin Legislature ("Legislature") hereby submits this Proposed Motion to Dismiss Plaintiffs' Complaint. The Legislature sets forth the grounds for this Motion in its Memorandum In Support Of Its Proposed Motion To Dismiss The Complaint, which it has filed contemporaneously with this Proposed Motion. For the reasons set forth in this supporting memorandum, the Legislature respectfully request that this Court grant its Proposed Motion.

Dated, June 8, 2020

Respectfully Submitted,

/s/ Misha Tseytlin

MISHA TSEYTLIN

(State Bar No. 1102199)

KEVIN M. LEROY

(State Bar No. 1105053)

SEAN T.H. DUTTON

TROUTMAN SANDERS LLP

227 W. Monroe Street

Suite 3900

Chicago, IL 60606

(608) 999-1240

(312) 759-1939 (fax)

misha.tseytlin@troutman.com

kevin.leroy@troutman.com

sean.dutton@troutman.com

Attorneys for the Wisconsin Legislature

CERTIFICATE OF SERVICE

I hereby certify that on the 8th day of June, 2020, a true and accurate copy of the foregoing was served via the Court's CM/ECF system upon all counsel of record.

/s/ Misha Tseytlin

MISHA TSEYTLIN

TROUTMAN SANDERS LLP

227 W. Monroe Street

Suite 3900

Chicago, IL 60606

(608) 999-1240

(312) 759-1939 (fax)

misha.tseytlin@troutman.com